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February 18, 2025

VIA ECF

Hon. Harvey Bartle III, U.S.D.J.
16614 U.S. Courthouse
601 Market Street
Courtroom 16-A
Philadelphia, PA 19106

Re: *John Doe-1 and Jane Doe-2, individually and on behalf of all others similarly situated v. LexisNexis Risk Solutions Inc. et al.*
Civil Action No. 1:24-cv-04566

Dear Judge Bartle:

This firm represents Defendant LexisNexis Risk Solutions Inc. (“LexisNexis”) in the above-referenced case. We write regarding the Rule 16 telephone conference that has been scheduled for February 25.

Earlier this month, Plaintiffs filed their Second Amended Complaint, which alleges that LexisNexis violated the Fair Credit Reporting Act (“FCRA”), 15 U.S.C. § 1681 et seq. Our deadline to respond to the complaint is March 6. We are preparing a motion to dismiss, which we believe raises significant issues as to the viability of Plaintiff’s claims as a matter of FCRA law and that may be dispositive of this case.

We therefore write to respectfully request that the February 25 teleconference be adjourned to provide Your Honor with an opportunity to review our motion papers before ruling on discovery matters and other subjects at a Rule 16 conference. We note that the motion to dismiss will be on file the week after the date on which the conference is presently scheduled.

We thank Your Honor for your consideration and, of course, are prepared to proceed on February 25 if that is Your Honor’s instruction.

Respectfully submitted,

/s/ A. Matthew Boxer

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cc: All Counsel of Record (via ECF)